

Federal Defenders  
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Southern District  
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April 11, 2022

By ECF

The Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

4/12/2022

Re: United States v. Baudilio Reyes  
20 CR 507 (PAC)

*Sentencing will be adjourned for  
60 days to June 28, 2022  
I am  
So ordered  
Paul A. Brown, LHA*

Dear Judge Crotty:

I write with the consent of the Government to request an adjournment of Mr. Reyes's sentencing hearing for a period of approximately 60 days. This is Mr. Reyes's first request for an adjournment of sentencing. I am awaiting additional records and documentation critical to his sentencing. Moreover, the parties await completion of the final Presentence Report. The requested adjournment will provide the defense with enough time to obtain and incorporate into its advocacy, records that serve as important mitigation evidence and that are critical to Mr. Reyes's sentencing hearing. Significantly, Mr. Reyes continues to be compliant with his Pretrial conditions of release and continues to work full time in masonry and construction (as verified by Pretrial Services).

As noted above, the Government consents to this request for an adjournment. Both parties are available the week of June 27, 2022.

Respectfully submitted,

/s/  
Zawadi Baharanyi  
Assistant Federal Defender  
917-612-2753

cc: Kaylan Lasky  
Assistant United States Attorney  
(by ECF)